

1 Gustavo Ponce, Esq.
Nevada Bar No. 15084
2 Mona Amini, Esq.
Nevada Bar No. 15381
3 **KAZEROUNI LAW GROUP, APC**
6940 S. Cimarron Rd., Suite 210
4 Las Vegas, Nevada 89113
Telephone: (800) 400-6808
5 Facsimile: (800) 520-5523
E-mail: gustavo@kazlg.com
6 mona@kazlg.com

7 *Attorneys for Plaintiff,*
8 *John C. Pipes*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 **JOHN C. PIPES,**

12 **Plaintiff,**

13 **vs.**

14 **ASPEN NATIONAL FINANCIAL,**
15 **INC. d/b/a ASPEN NATIONAL**
16 **COLLECTIONS; TRANS UNION,**
17 **LLC,**

18 **Defendants.**

Case No.: 2:24-cv-02170-MMD-EJY

**JOINT STIPULATION AND
ORDER EXTENDING
DISCOVERY DEADLINES**

(FIRST REQUEST)

20 Plaintiff John C. Pipes (“Plaintiff”), and Defendant Trans Union LLC (“Trans
21 Union”) (“the Parties”) hereby jointly move to extend all remaining deadlines set
22 forth in the Joint Proposed Discovery Plan and Scheduling Order filed with this Court
23 on February 13, 2025, (ECF No. 21) by a period of ninety (90) days.

24 In It is the Parties’ belief that the additional 90 days will alleviate the pressure
25 on dates with the possibility of resolution, and to flush out any discovery
26 disagreements.
27
28

1 In addition, the parties are working in good faith to discuss potential resolution
2 of this matter and have mutually agreed it is in the best interest of all Parties to extend
3 the time while the Parties' settlement discussions remain ongoing. In addition, the
4 Parties wish to conserve their respective resources as well as the Court's time and
5 resources on this matter if a resolution can be achieved during this brief extension of
6 time. The Parties are working together in good faith to work out any issues that arise
7 due to the facts of this matter.

8 The Parties in good faith believe more time is necessary to conduct efficient
9 discovery and for the Parties to have effective conversations regarding potential
10 resolution.

11 1. On November 20, 2024, Plaintiff filed his Complaint (ECF No. 1),
12 against Defendants Aspen National Financial Inc. and Trans Union.

13 2. Trans Union filed its Answer to Plaintiff's Complaint on December 16,
14 2024 (ECF No. 10).

15 3. The Parties have completed the following discovery to date:

- 16 • The Parties have exchanged initial disclosures.
- 17 • Plaintiff served Trans Union with a request for production of documents,
18 request for admissions and interrogatories, on June 11, 2025.
- 19 • Defendant Trans Union initially served Plaintiff with discovery
20 consisting of request for production of documents, request for
21 admissions and interrogatories on April 21, 2025, via counsel of record
22 Gustavo E. Ponce and Mona Amini but mistyped Mr. Ponce's email
23 resulting in such discovery not being properly being served on both of
24 Plaintiff's counsel of record. After realizing its mistake Trans Union re-
25 served its discovery on Plaintiff via both counsel of record at their
26 correct email addresses on June 11, 2025.

- The Parties have discussed deposition dates for each side and are working diligently and in good faith to find dates that work for each side.

- Defendant has served numerous subpoenas to third parties.

4. The Parties still need to conduct depositions, potentially additional written discovery, serve additional subpoenas and conduct third-party depositions.

5. The additional time will allow the Parties to conduct additional fact discovery, including taking depositions, potentially additional written discovery, acquiring all documents from third-parties, and resolving any discovery issues.

6. No party will be prejudiced by this Court granting this Stipulation as all Parties jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the extension will serve the ends of judicial economy.

7. Moreover, the requested extensions are not sought for the purposes of delay.

8. This is the Parties' first request to extend these deadlines.

9. Accordingly, the parties request adoption of the following deadlines:

a. Discovery Plan:

Discovery Cut-off **11/10/2025**

Deadline to File Dispositive Motions **12/09/2025**

b. Pre-Trial Order: The parties shall file a joint pretrial order no later than **01/08/2026** or thirty (30) days after the date set for filing dispositive motions. In the event that Parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court.

///

///

///

WHEREFORE, Plaintiff and Trans Union respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

Dated this 27th day of June 2025.

KAZEROUNI LAW GROUP, APC

/s/ Gustavo Ponce

Gustavo Ponce
Mona Amini
6940 S. Cimarron Rd., Suite 210
Las Vegas, Nevada 89113

Counsel for Plaintiff

SKANE MILLS LLP

/s/ Sarai L. Brown

Sarai L. Brown
1120 Town Center Drive, Suite 200
Las Vegas, NV 89144

Counsel for Trans Union

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 27, 2025